

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Karen Wells and Andre Locke as  
co-trustees for the next of kin of  
Amir Rahkare Locke, deceased,

Plaintiffs,

Case No. 23-cv-273 (WMW/DLM)

v.

**Stipulation Regarding  
Scheduling and Other Relief**

Mark Hanneman, in his individual capacity  
as a Minneapolis police officer, and the  
City of Minneapolis,

Defendants.

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Whereas, the Defendants filed a Motion for Judgment on the Pleadings, scheduled for hearing on July 27, 2023;

Whereas, the parties met and conferred on several scheduling issues, including Plaintiffs' intent to file a First Amended Complaint;

Whereas, the parties attended a Pretrial Conference on June 21, 2023, which was converted into a Chambers Conference [ECF No. 34] in light of the parties' meet and confer efforts;

Whereas, the parties were Ordered to provide the Court with an update by June 30, 2023, regarding the implications of the First Amended Complaint and other matters that were met and conferred on;

Whereas, the parties have reached the following agreement and respectfully request that the Court issue the necessary Order (or Orders) to effectuate this agreement:

1. Defendants withdraw their pending Motion for Judgment on the Pleadings without prejudice, and the July 27, 2023 Hearing on Defendants' Motion for Judgment on the Pleadings shall be stricken from the Court's Calendar with no further briefing relative to that motion;
2. Plaintiffs shall file and serve the First Amended Complaint and a redline by July 7, 2023;
3. Defendants reserve all rights and defenses with respect to the First Amended Complaint and Plaintiffs will not argue, or use this stipulation to argue, that Defendants have waived, altered, or otherwise limited their defenses to the First Amended Complaint;
4. Defendants shall have until August 27, 2023, to respond to Plaintiffs' First Amended Complaint;
5. The parties shall provide an Amended Rule 26(f) Report to the Court by July 7, 2023, while Defendants reserve their right to seek a stay of all discovery;
6. Plaintiffs will propose a date for initial disclosures no sooner than September 1, 2023;
7. Plaintiffs agree that Defendants will have at least 60 days after service of written discovery or until October 1, 2023, whichever is later, to respond to any discovery requests and produce documents;

8. The parties can start issuing subpoenas to third parties immediately upon entry of a Protective Order; and

9. The Court shall set a new date for a Pretrial Conference held via Zoom or other remote means.

**Stipulated and agreed on behalf of the parties by:**

**NEWMARK STORMS DWORAK LLC**

Dated: June 30, 2023

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DATE: June 30, 2023

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